

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AKHMED GADZHIEVICH BILALOV, an individual,

Plaintiff,

- against-

HERMAN GREF and KIRILL ANDROSOV,

Defendants

Civil Action No.

**NOTICE OF EX PARTE MOTION
TO FILE UNDER SEAL**

(FILED UNDER SEAL)

PLEASE TAKE NOTICE that Plaintiff, AKHMED GADZHIEVICH BILALOV, will move this honorable Court pursuant to the Federal Rules of Civil Procedure Rule 7(b) and Rule 5.2(d), upon the Memorandum of Law and other papers and Pleadings in this matter, at the United States District Court, Eastern District of New York, United States District Court Southern District of New York 500 Pearl Street, New York, NY 10007, on such date and at such time as the Court sets, for an Order granting leave of this Court to proceed under seal, to protect the identity of the plaintiff as well as to keep the facts and documents in the instant case from becoming public, and to grant any other relief that the Court deems necessary and just.

Dated: New York, New York
October 30th, 2020

Respectfully Submitted,

/s/ Irina Shpigel

Irina Shpigel

Shpigel & Associates, P.C.

Attorney for Plaintiff

250 Greenwich Street

New York, New York 10007

E-mail: ishpigel@iselaw.com

T 212-390-1913

F 646-355-0242